

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CASE NO. 1:22-bk-00849 HWV
DAVID EARL FRENCH	:	
a/k/a DAVE E. FRENCH	:	
DONNA MARIE FRENCH	:	
Debtors	:	CHAPTER 13

**MOTION FOR EXTENSION OF TIME TO FILE
SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF
CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST,
PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS AND CHAPTER 13 PLAN**

AND NOW comes Debtors, David Earl French and Donna Marie French, by and through their attorney, Gary J. Imblum, and respectfully represents:


- 1. Debtors filed a Chapter 13 Bankruptcy to the above term and number on May 6, 2022.**
- 2. Debtors filed the bankruptcy as an emergency filing due to a utility shutoff.**
- 3. Debtors' counsel has been unable to gather sufficient information necessary to file the schedules and plan due to the emergency filing.**
- 4. Debtors' schedules are due to the Court on or before May 21, 2022.**

5. It is estimated that Debtors' counsel will need an additional 30 days in order to file the bankruptcy schedules and plan.

WHEREFORE, Debtors respectfully request that this Honorable Court issue an Order extending the deadline for Debtors to file bankruptcy schedules and plan until June 20, 2022.

Respectfully submitted,

IMBLUM LAW OFFICES, P.C.



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Dated: May 20, 2022

CERTIFICATE OF SERVICE

I, Bernadette A. Davis, Paralegal, hereby certify that I have served a copy of the foregoing MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES, SUMMARY OF SCHEDULES, STATISTICAL SUMMARY OF CERTAIN LIABILITIES AND RELATED DATA, MEANS TEST, PAY STUBS, STATEMENT OF FINANCIAL AFFAIRS AND CHAPTER 13 PLAN on the following person(s) by E-Service, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

IMBLUM LAW OFFICES, P.C.



Bernadette A. Davis, Paralegal

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Email: gary.imblum@imblumlaw.com

Dated: May 20, 2022

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ORDER

Upon consideration of Debtors' Motion for Extension of Time to File Schedules, Summary of Schedules, Statistical Summary of Certain Liabilities and Related Data, Means Test, Pay Stubs, Statement of Financial Affairs and Chapter 13 Plan,

**IT IS HEREBY ORDERED AND DECREED that the deadline for filing the
aforementioned pleadings in the above captioned case is extended through June 20, 2022.**